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June 9, 2025

Via ECF

The Honorable Mary Kay Vyskocil
United States District Judge
United States District Court for the Southern District of New York
Daniel Patrick Moynihan Courthouse
500 Pearl Street
New York, NY 10007

Re: *The Hearst Corporation v. Ace American Insurance Company*,
Case No. 1:24-cv-06890-MKV
Joint Letter Under Individual Rules of Practice, Rule 2(G)
Request for Brief Adjournment of Post-Discovery Conference

To the Honorable Judge Vyskocil,

The Hearst Corporation (“Hearst”) and Ace American Insurance Company d/b/a Chubb (“Chubb”) (jointly, the “Parties”), submit this Joint Letter pursuant to Your Honor’s Individual Rules of Practice, Rule 2(G) to request a brief adjournment to the post-discovery conference, which is currently scheduled for June 30, 2025, to July 16, 2025, or another suitable date after the second week of July.

On March 7, 2025, the parties sought an extension of the fact discovery deadline, including an adjournment of the post-discovery conference which was then scheduled for May 20, 2025. *See* Doc. No. 31. The Court approved this extension, and set the parties’ post-discovery conference for July 16, 2025. *See* Doc. No. 32. On April 10, 2025, Chubb sought a second extension of the fact discovery deadline, including an extension of the post-discovery conference to a date in August. *See* Doc. No. 35. After a conference before the Court on April 15, the Court extended the fact discovery deadline to June 16, 2025. The Court also moved up the post-discovery conference from July 16 to June 30. *See* Doc. No. 43.

The parties now seek a brief adjournment of the post-discovery conference, from June 30, 2025 back to the date that the Court had previously set the conference: July 16, 2025. The adjournment is being sought to accommodate scheduling conflicts (including a previously scheduled vacation) which would prevent Hearst and its counsel from being prepared to attend a post-discovery hearing on June 30. The adjournment is only being sought as to the post-

discovery conference, and the other discovery deadlines set by this Court's Scheduling Order (Doc. No. 43), including the deadline for fact discovery, have been complied with.

Both parties consent to this request for an adjournment.

Kind regards,

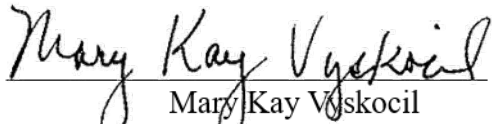
/s/ Alexander Hardiman

Alexander D. Hardiman
Partner

As the parties acknowledge, the upcoming post-discovery conference has been scheduled since April 15, 2025. The parties waited nearly two months to notify the Court of scheduling conflicts. The parties are admonished to advise the Court of any conflicts as soon as they become aware of them. Nevertheless, the parties' request is HEREBY GRANTED. The parties shall appear for a post-discovery conference on Tuesday, July 15, 2025 at 11:30 AM. The parties shall file any materials required by the Case Management Plan or the Court's Individual Rules one week prior to the conference.

SO ORDERED.

Date: June 16, 2025
New York, New York


Mary Kay Vyskocil
United States District Judge